

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 MIRANDA KANE (CABN 150630)
3 Chief, Criminal Division

4 CAROLYNE ARANGO SANIN (DCBN 499564)
Special Assistant United States Attorney
5 150 South Almaden Boulevard, Suite 900
San Jose, California 95113
6 Telephone: (408) 535-5596
Facsimile: (408) 535-5066
7 carolyne.sanin@usdoj.gov

8 Attorneys for the United States

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 UNITED STATES OF AMERICA,)	No. 12-CR-132 EJD
)	
14 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING HEARING TO
15 v.)	APRIL 30, 2012
)	
16 GONZALO COVARRUBIAS-FLORES,)	
)	
17 Defendant.)	
)	
)	

19
20 The Parties, acting through respective counsel, hereby stipulate, subject to the Court's
21 approval, that the hearing currently set for April 2, 2012 at 1:30 p.m. be vacated, and that the
22 hearing be re-set for April 30, 2012 at 1:30 p.m. The parties are requesting the continuance of
23 the hearing due to the need for additional time for effective preparation, the need to jointly
24 negotiate a resolution in this matter, and for the continuity of counsel, given that government
25 counsel will not be available on April 2, 2011.

26 The parties stipulate that the time between April 2, 2012 and April 30, 2012, is excluded
27 under the Speedy Trial Act, 18 U.S.C. §3161, and agree that the failure to grant the requested
28 continuance would unreasonably deny defense counsel reasonable time necessary for effective
preparation, taking into account the exercise of due diligence. Finally, the parties agree that the

ends of justice served by granting the requested continuance outweigh the best interest of the public, and the defendant in a speedy trial and in the prompt disposition of criminal cases. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

DATED: March 21, 2012

MELINDA HAAG
United States Attorney


/s/
CAROLYNE A. SANIN
Special Assistant United States Attorney

/s/
VARELL FULLER
Attorney for Defendant

PROPOSED ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court HEREBY ORDERS that the hearing in this matter previously set for April 2, 2012 at 1:30 p.m. is vacated, and the matter is continued to April 30, 2012 at 1:30 p.m.
IT IS SO ORDERED.

DATED: March 23, 2012


EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE